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Attorney for Mr. Jesus Herrera-Torres

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
**(HONORABLE JEFFREY T. MILLER)**

UNITED STATES OF AMERICA, ) CASE NO. 08CR0690-JM

Plaintiff, )

DATE: May 9, 2008

TIME: 11:00 A.M.

v. )

NOTICE OF MOTIONS AND MOTIONS TO:

JESUS HERRERA-TORRES, )

Defendant. )

(1) COMPEL DISCOVERY;

(2) PRESERVE EVIDENCE;

(3) SUPPRESS STATEMENTS; AND

(4) GRANT LEAVE TO FILE FURTHER  
MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND  
MARK CONOVER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on May 9, 2008 at 11:00 a.m., or as soon thereafter as counsel may be heard, defendant, Jesus Herrera-Torres, by and through his attorney, Anthony E. Colombo Jr., will ask this Court to enter an order granting the following motions.

**MOTIONS**

Defendant, Jesus Herrera-Torres, by and through his attorney, Anthony E. Colombo Jr., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel Discovery;
- (2) Preserve Evidence;
- (3) Suppress Statements; and
- (4) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: April 15, 2008

/s/ Anthony E. Colombo Jr.  
**ANTHONY E. COLOMBO JR.**  
Attorney for Mr. Herrera-Torres  
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